

**MEMO ENDORSED****Green & Willstatter**

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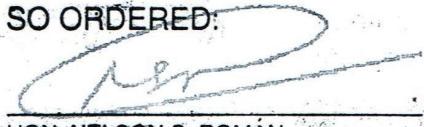
Hon. Nelson S. Roman  
 United States District Court  
 300 Quarropas Street  
 White Plains, New York 10601

**Deft. Randall's (03) request to modify two bail conditions, without objection by the Gov't and Pretrial Services Officer Piperato, are GRANTED as outlined in this letter. Clerk of Court is requested to terminate the motion at ECF No. 27.**

**Dated: White Plains, NY**

**October 21, 2024**

**SO ORDERED:**

  
**HON. NELSON S. ROMÁN  
 UNITED STATES DISTRICT JUDGE**

Dear Judge Roman:

This letter is an application for two modifications of the bail conditions for Anthonio Randall. I have conferred with Pretrial Services Officer Francesca Piperato and AUSA Margaret Vasu and both have advised me that they have no objection to the modifications.

**First requested modification**

Mr. Randall's current bail conditions include home detention with GPS monitoring, with exceptions that include leaving home for work, attorney visits, court attendance, and other activities approved by the pre-trial services office. We request that these conditions be modified to a curfew enforced by GPS monitoring, the hours to be set at the discretion of the pretrial services office. I am advised that Mr. Randall has been in compliance with the pretrial services office. He has maintained steady employment since being released on bond.

**Second requested modification**

The current bail conditions restrict travel to SDNY/EDNY, although the Court had previously granted a modification to allow travel to Connecticut to pick up and drop off one of his children for visitation. Because, on occasion, Mr. Randall's employer expects him to travel to a neighboring state, we seek a modification permitting travel to the District of New Jersey and the District of Connecticut for work purposes, provided that his employer provides the pretrial services office with notice of any expected travel to these states. (Mr. Randall works for a company that provides services to disabled adults, and his job duties include transporting or accompanying the clients on trips.)

Very truly yours,  
 /s/ *Theodore S. Green*  
 Theodore S. Green

cc: All counsel (by ECF)  
*Francesca\_Piperato@nyspt.uscourts.gov*

USDC SDNY
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